



The Honorable Jay Clayton  
 Chairman  
 Securities and Exchange Commission  
 100 F Street NE  
 Washington, DC 20549

November 18, 2019

Re: File Nos. S7-22-19 & S7-23-19

Dear Mr. Chairman,

I am writing to you on behalf of the Thirty Percent Coalition Institutional Investor member base representing over \$5 trillion in assets under management. We respectfully request an extension of the comment period from 60 to 120 days for the proposals entitled "Amendments to Exemptions from the Proxy Voting Rules for Proxy Voting Advice" and "Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8."

The two concurrent proposed rules, individually and collectively if adopted, would result in the most significant changes to the voting rights of shareowners in decades. The proposals are complex, a combined 320 pages in length, and include 345 individual questions for commentators. The proposals explicitly and repeatedly request that commentators provide supporting "data."

Many members of the Thirty Percent Coalition intend to be responsive to this request in comment letters. However, it is believed that the time period in which to provide these comments is restrictive. The proposed concurrent 60-day comment period for the proposals will include at least three public holidays depending upon when the proposals are published in the federal register. Thus, the proposed concurrent comment period is effectively much shorter than 60 days for proposals. For the benefit of investors, issuers, other market participants, the Securities and Exchange Commission, and the capital markets generally, we respectfully request that you extend the comment period from 60 to 120 days for the aforementioned proposals.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Laurent-Ottomane".

Charlotte Laurent-Ottomane  
 Executive Director

CC: The Honorable Robert J. Jackson, Jr., Commissioner  
 The Honorable Allison Herren Lee, Commissioner  
 The Honorable Hester M. Peirce, Commissioner  
 The Honorable Elad L. Roisman, Commissioner  
 Dalia Osman Blass, Director, Division of Investment Management  
 William H. Hinman, Director, Division of Corporation Finance